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Geoenvironmental Services



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A Report Prepared for

Port of Seattle Pier 66 Seattle, Washington 98111

UNDERGROUND STORAGE TANK INVESTIGATION IN THE VICINITY OF THE CITY ICE BUILDING TERMINAL 91 FOR THE PORT OF SEATTLE

HLA Job No. 14124,011.09

by

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June 18, 1990

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#### 1.0 INTRODUCTION

This report presents results of the soil and groundwater investigation performed by Harding Lawson Associates (HLA) in the vicinity of the Tank 91N site at the Port of Seattle's (Port) Terminal 91 (Figure 1-1). This work was authorized by an agreement dated December 15, 1989, between the Port and HLA. The work authorized included observation of underground storage tank (UST) removal, soil sampling during tank removal, installation of three monitoring wells, and soil and groundwater analyses.

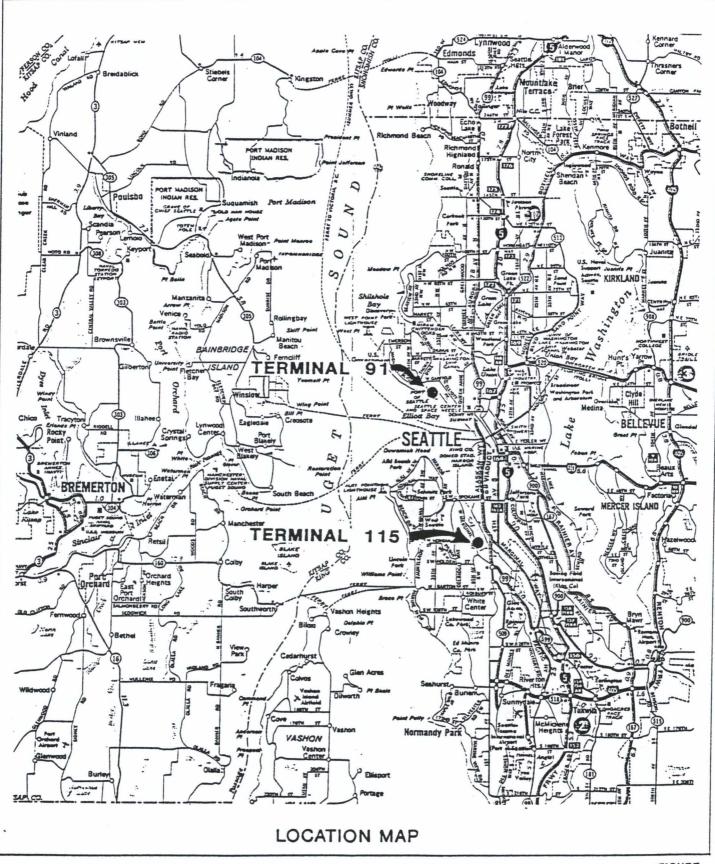
Tank 91N was removed from Terminal 91 on December 22, 1989. The tank was an approximately 650-gallon steel tank used for storage of diesel fuel. The tank was located approximately 10 feet north of the old City Ice building (Cold Storage Warehouse, Building W-39 on Figure 1-2) and held fuel used for a standby generator at the building.

#### 1.1 BACKGROUND

Hydrocarbon contamination of soils and groundwater in the vicinity of the Tank 91N site has been documented during investigations for construction of the new City Ice building (Building W-390) north of the Tank 91N site and by an investigation of the Chemical Processors, Inc. (Chempro) facility east of the Tank 91N site. GeoEngineers, Inc. reported that shallow groundwater in the vicinity of the Building W-390 site contained 5 part per million (ppm) petroleum hydrocarbons, 0.030 ppm benzene, 20 ppb orthoxylene, and a trace of diesel fuel ("Summary of Supplemental Monitor Well Measurements," August 31, 1987).

Hydrogeologic investigations have been conducted in the vicinity of the Chempro site since late in 1987 by Sweet Edwards/EMCON Inc. (SE/E), as described in the SE/E report "Hydrogeologic Investigation, Pier 91 Facility, Chemical Processors, Inc.," dated April 24, 1989 and summarized below. The site is underlain by a shallow water-table aquifer composed of 15 to 20 feet of sand and gravel deposited as fill, having a horizontal hydraulic conductivity of 10<sup>-2</sup> to 10<sup>-4</sup> centimeters per second (cm/sec). Groundwater in this aquifer generally flows to the southwest at hydraulic gradient of 0.002 (2 feet change in head per 1,000 feet horizontally). The HLA investigation near the Tank 91N site is limited to the shallow water-table aquifer.

1-1



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Harding Lawson Associates

Engineering and Environmental Services

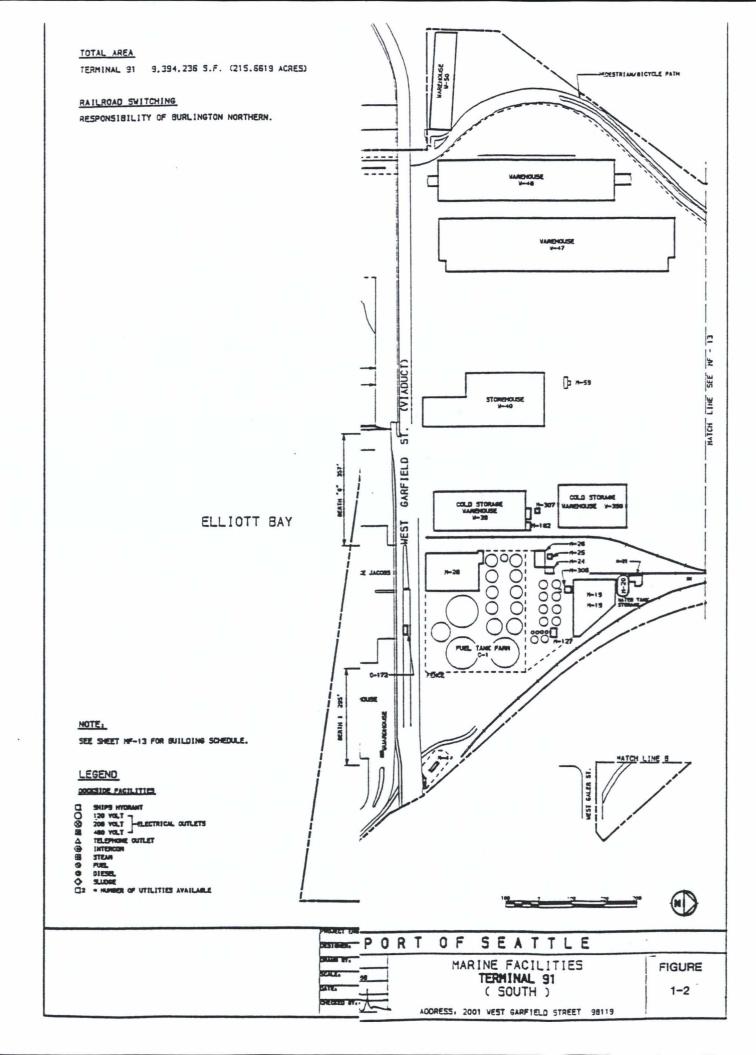
PORT OF SEATTLE

FIGURE

1-1

DRAWN

JOB NUMBER 1412401109 APPROVED GW DATE



SE/E installed three shallow monitoring wells (CP-104-A, CP-107, and CP-110) and one temporary boring (TB-2) between Building W-39 and the Chempro facility (Figure 1-3). Based on the groundwater flow direction reported by SE/E (to the southwest), TB-2 and CP-104A are hydraulically upgradient of the Tank 91N site. Benzene, toluene, ethylbenzene, and xylene (BTEX) compound concentrations totaling 78 ppm were detected in a near-surface soil sample from TB-2. Significant concentrations of other volatile and semivolatile organic compounds were also present in soils from this boring.

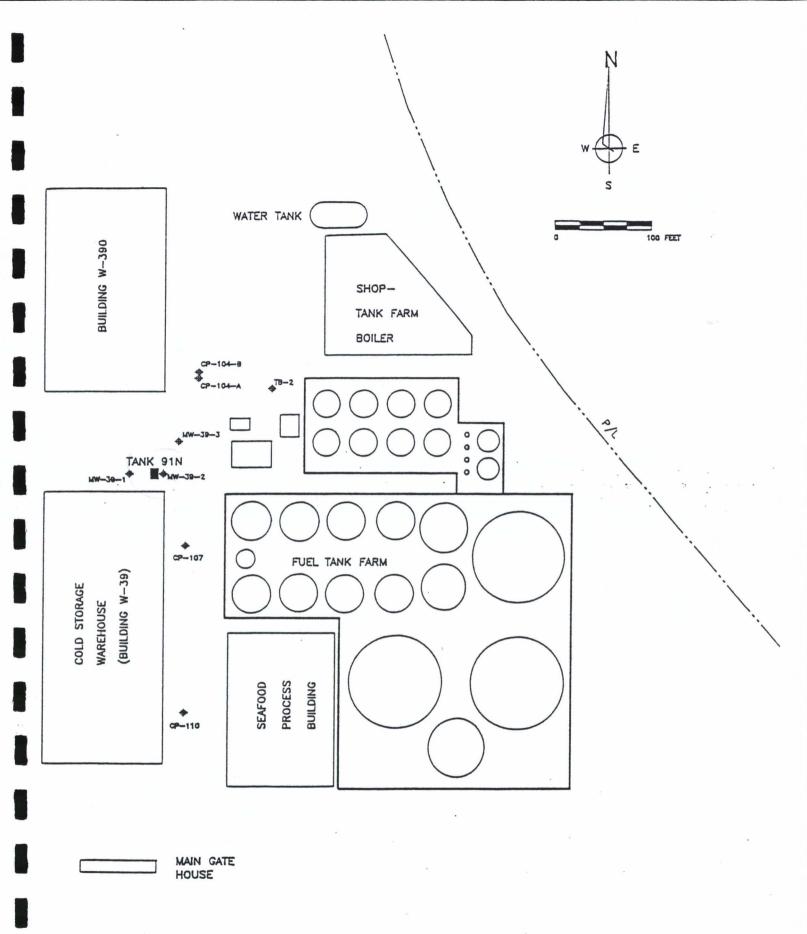
Free product was reported by SE/E on the water table in CP-107 and TB-2. BTEX concentrations in water from TB-2 in March 1989 were 1.0, 2.4, 0.48 and 1.1 ppm, respectively. BTEX concentrations from the March 1989 sampling of CP-104-A were 0.0059, 0.020, 0.0055, and 0.020 ppm, respectively. Organic constituents in the water that exceeded EPA maximum contaminant levels included vinyl chloride and 1,1-dichloroethene in CP-104-A and TB-2.

Underneath the fill is a silty sand aquitard which extends to a depth of 30 to 45 feet. A confined aquifer composed of gravelly sand underlies the aquitard. Well CP-104-B was installed in the lower aquifer. The groundwater flow direction in this aquifer is south to southeast and the horizontal hydraulic gradient is approximately 0.007. SE/E reported that water levels in wells in this aquifer were affected by tidal fluctuations and that a downward hydraulic gradient of 0.023 was present at CP-104. SE/E measured horizontal hydraulic conductivities from 10<sup>-3</sup> to 10<sup>-4</sup> cm/sec and reported the average hydraulic conductivity as  $10^{-2}$  cm/sec. Concentrations of organic compounds were near or below detection limits in the confined aquifer.

#### 1.2 REMOVAL OF TANK 91N

Meridian Excavating removed Tank 91N from the area outside of the northeast corner of Building W-39 on December 22, 1989: HLA personnel were on site during the tank removal to observe the conditions of the UST system and to document the conditions of soils and groundwater in the tank excavations. Information previously supplied by to HLA by the Port indicated that soils in the vicinity of this tank had up to 50,000 ppm of total petroleum hydrocarbons.

1-2



MONITORING WELLS AND SOIL BORINGS LOCATIONS

FIGURE 1-3
BUILDING W-39 VICINITY MAP

Immediately prior to removal, Meridian added dry ice to the tank to expel flammable vapors. The Seattle Fire Department subsequently determined that the tank was safe for removal.

Overlying soil and asphalt cover was excavated by Meridian using a tire-mounted backhoe.

The uppermost excavated soil was dark brown and became gray to the 2-foot depth, apparently stained and saturated with petroleum product. In the northeast corner of the tank pit there was a black layer of gravelly sand, approximately one- to two-feet thick, extending towards the south and west ends of the tank pit. Initial organic vapor meter (OVM) readings of 18 ppm, calibrated to isobutylene gas, were obtained from the gray soil. No OVM response was recorded from the dark brown soil.

An approximately 3-feet thick, 2.5-feet wide by 4-feet long concrete block was on top of the tank. Once the block was removed, two puncture holes were observed in the middle of the top of the tank. During excavation, the backhoe put a large hole and dent on the north end of the tank. No corrosion holes were observed in the middle and north end of the tank. Corrosion pits and numerous corrosion holes (up to 1/2-inch diameter) were noticed on top half of the south end of the tank and on the tank top near the intake pipe. The steel tank was buried 3 feet below grade and was 8 feet long and 46 inches in diameter. A steel tag attached to the tank identified the manufacturer as Amick Sheet Metal Works and the capacity as 672 gallons.

Pipes in the west and east side of the tank pit, approximately 3 feet below ground surface, were very rusted. However, no obvious holes were observed. The tank was not anchored in place from below and no concrete pad was present beneath the tank.

HLA collected a soil sample from the southwest corner of the tank pit, from the saturated, black gravelly sand, that had a diesel odor. An OVM reading of 73 ppm was taken from this sample. HLA also sampled gray stained soil that had a very slight diesel odor and OVM reading of 50 ppm, from the northeast corner of the tank pit. Both samples were collected from just below the former tank position at approximately 6 feet below ground surface. No groundwater was encountered in the hole. Following excavation of the tank, Meridian filled the hole with the excavated soil and clean fill material.

#### 2.0 SOIL AND GROUNDWATER INVESTIGATION

The "Draft Work Plan for Underground Storage Tank Investigations at Terminals 91 and 115 for the Port of Seattle" dated January 12, 1989 was used as a basis for the field investigation described below. Modifications to the planned field investigation were made during meetings with Port personnel and as the field investigation progressed.

#### 2.1 DRILLING AND SOIL SAMPLING

HLA began the soil and groundwater investigation of the Tank 91N site on January 16, 1990 to assess the extent of hydrocarbons in the soil and groundwater at the tank site. Three monitoring wells (MW-39-1, -2, and -3) were installed and sampled (Figure 1-3). Prior to drilling the boreholes, the locations of electrical, steam, water, gas, telephone, and sewer lines were marked in the vicinity of the site. Concrete cutting was required for drilling boreholes MW-39-1 and MW-39-2.

Drilling and soil sampling was performed using a truck-mounted Mobile B-61 drill rig equipped with hollow-stem augers, owned and operated by Hokkaido Drilling and Development Corporation of Graham, Washington. Four-inch inside-diameter hollow-stem augers were used for drilling MW-39-1. Because heaving sands were encountered while drilling this borehole, 6-inch inside diameter augers were used during drilling the other boreholes. Water was added to the augers while drilling to maintain hydrostatic head in the augers to minimize the amount of sand flowing into the augers.

A split-spoon sampler, lined with three 2-inch diameter by 6-inch long brass tubes, was used to obtain soil samples at 2.5 feet below grade and at subsequent five-foot intervals. The sampler was driven 18 inches below the auger bit using a 140-pound hammer falling 30 inches and the number of blows required for each 6-inch interval were recorded. The lowermost brass tube from each sample was sealed with aluminum foil, capped with plastic caps, and saved for laboratory analysis.

Soil was visually classified using the Unified Soil Classification System. Soil samples were monitored for visual indications of product and organic vapors using odors and OVM measurements in the field. The presence of vapors, hydrocarbon odors, or visual evidence of petroleum product in the soils was logged. Soil hydrocarbon vapor measurements were made by extracting soil from the sampler tip and/or middle brass tube into a plastic bag and aspirating the vapors. The OVM was calibrated with isobutylene gas. The OVM was not functioning during the drilling of MW-39-1.

No evidence of hydrocarbon contamination was seen in soils from the MW-39-1 borehole. Product saturated soils were encountered in soils above the water table in the other two boreholes.

An on-site mobile laboratory equipped with a Hewlett-Packard 5890 gas chromatograph, operated by Enviros Laboratories of Bellevue, Washington, was initially used at Terminal 91 tank site. The on-site mobile laboratory provided rapid analyses of soils using modified EPA Method 8015 for petroleum hydrocarbon fingerprinting. The mobile laboratory was used only during drilling of MW-39-1, because field conditions made drilling and well installation slower than anticipated. Remaining soil samples were analyzed by Enviros in their Bellevue laboratory.

A steel pipe that had not been located and marked was encountered while drilling MW-39-3. The borehole was moved and a different pipe was encountered. The borehole was successfully drilled approximately five feet east of the original location. The abandoned boreholes were filled with bentonite chips and capped with cement.

All down-hole equipment was steam-cleaned prior to drilling each hole. The soil sampling equipment was cleaned with detergent and rinsed with tap water followed by distilled water prior to obtaining each sample.

#### 2.2 MONITORING WELL INSTALLATION

Monitoring wells were installed in the three boreholes (Table 2-1). Two-inch diameter flush-threaded Schedule 40 polyvinyl chloride (PVC) casing and screen (with 0.020-inch machine-cut slots) was used for well construction. A bottom threaded cap and top locking cap were installed on each well. The top of each well screen was placed approximately 2 feet above the water

APPENDIX A FIELD DATA

table. Wells were sand-packed with Lone Star number 2/16 Lapis Lustre sand and sealed with approximately one foot of bentonite chips. A traffic-rated street box was cemented into the surface at each site.

During installation of MW-39-1, sand bridged between the augers and well casing, raising the well. Water was added to the borehole to loosen the casing in order to jet the casing into place.

Table 2-1. Monitoring Well Construction.

Well Number	Date Completed	Borehole Depth (feet)	Screened Interval (feet)	Top of Sand Pack (feet)	Depth to Top of Casing (feet below grade)
MW-39-1	1/18/90	17.5	3.8-13.8	3.0	0.63
MW-39-2	1/18/90	14.8	4.0-14.0	2.8	0.79
MW-39-3	1/19/90	14.0	4.0-14.0	2.0	0.42

All soil cuttings and water derived from drilling, sampling, and cleaning was stored on-site in 55-gallon barrels. The soil cuttings were removed and soil was disposed of by Field Support Services, Inc.

Ground elevation and location data were supplied by the Port, and are included on the logs of borings in Appendix A.

#### 2.3 WELL DEVELOPMENT AND SAMPLING

The three wells were developed by surging and bailing on January 26, 1989 (Table 2-2). Water levels were recorded in feet below the top of casing (btoc). Product or a product sheen was noted in MW-39-2 and -3. One casing volume in each well was approximately 1.5 gallons; therefore, 13 to 16 casing volumes were removed from each well during development.

Table 2-2. Well Development Information.

Well Number	Depth to Water (feet, btoc)	Volume Removed During Development (gallons)	Final pH (units)	Final Temperature (°C)
MW-39-1	4.58	25	7.7	11.3
MW-39-2	4.42	20	7.1	12.1
MW-39-3	4.83	20	7.0	12.1

MW-39-1 and -2 were subsequently sampled on February 12, 1990 (Table 2-3). Static water levels in each well and the presence and thickness of free product, if present, was monitored. MW-39-3 was not sampled because 0.85 feet of product was measured on top of the water, using a gauging bailer. Prior to sampling, both wells were purged using a hand-powered diaphragm pump. Temperature, pH, and conductivity of the water was monitored during purging. Samples were collected with a stainless-steel bailer after a minimum of 15 well volumes had been purged. Final temperature, pH, and conductivity measurements are given in Table 2-3.

Table 2-3. Groundwater Sampling Data.

Purge Volume (gallons)	pH (units)	Temperature (°C)	Specific Conductance (umhos/cm)
28	7.4	8	525 470
	Volume (gallons)	Volume pH (gallons) (units)	Volume pH Temperature (gallons) (units) (°C)

Water samples were poured from the bailer into sample containers in a manner to minimize aeration of the samples during the transfer process. The samples were retained in 40-milliliter vials. Water from the two wells was turbid, gray, had a moderate product odor, and had a slight product sheen. Care was taken to allow no air bubbles or headspace in the vials. The samples were labeled, wrapped to prevent breakage, and stored in an ice-filled cooler during field activities and transit to the laboratory. All samples were logged on chain-of-custody forms and delivered to Enviros' laboratory for analysis using modified EPA method 8015.

Monitoring and sampling equipment was decontaminated prior to use in each well by washing with a laboratory-grade detergent and rinsing with distilled water. Decontaminated sample vials were supplied by the laboratory.

#### 2.4 WATER-LEVEL MEASUREMENTS

Table 2-4 summarizes water-level measurements following well completion. Free product was observed in MW-39-2 and -3. The depth to water or free product was measured from the north side of the top of the PVC well casing. Because product, with a typical specific gravity of 0.85, is lighter than water, the measured depth to product is less than the depth to the water table. Where necessary, the water table depth was determined by adding the product thickness multiplied by the difference between the specific gravities of product and water, to the depth to fluid measurement.

Table 2-4. Water-Level Measurements.

Well Number	Top of Casing Elevation (feet)	Date	Depth to Fluid (feet, btoc)	Product Thickness (feet)	Water Table Elevation (feet)
MW-39-1	16.65	2/12/90	4.23	None	12.42
		6/15/90	4.86	None	11.79
MW-39-2	16.85	2/12/90	3.90	None	12.95
		6/15/90	4.65	1 (approx)	12.05
MW-39-3	17.34	2/12/90 6/15/90	5.02 5.10	0.85 0.85	13.04 12.11

Based on the water-level elevations given in Table 2-4, groundwater flows in the west to northwest direction. The hydraulic gradient is approximately 0.01.

Free product was also observed on the water surface in the SE/E well CP-107 on January 19, 1990. The depth to water was approximately 5.5 feet below grade and approximately one-eighth of an inch of product was present on the water surface.

#### 2.5 AQUIFER TESTING

During development, it was noted that water levels recovered almost immediately after bailing. For this reason, slug tests were not performed. Instead, hydraulic conductivity estimates were made using recovery data from well purging before sampling. The static water level, volume pumped from the wells before sampling, duration of pumping, and at least one recovery water-level measurement were recorded. Order-of-magnitude estimates of the hydraulic conductivity of the soils at each site were made using Skibitzke's residual drawdown method (Appendix A). The estimated hydraulic conductivity of the soils in the vicinity of MW-39-1 and MW-39-2 is  $10^{-2}$  cm/sec, which agrees with the value reported by SE/E for the Chempro site.

#### 2.6 LABORATORY ANALYSES

Enviros analyzed soil and groundwater samples collected during the removal of Tank 91N and the installation and sampling of the monitoring wells. Laboratory reports are included in Appendix B.

Table 2-5 lists the results of soil sampling. Samples S-3-SW and S-3-NE were obtained from the tank excavation. Samples from MW-39-1 were analyzed for total fuel hydrocarbons (TFH) using EPA Method 8015, modified, in Enviros' mobile laboratory. Other TFH analyses were performed in Enviros' Bellevue laboratory. Total petroleum hydrocarbons (TPH) analyses were performed by an Enviros subcontract laboratory.

Fuel type was characterized during TFH analyses. Number 2 diesel fuel was generally identified as the type of fuel hydrocarbon present in the soil samples. Light hydrocarbons (BTEX) characteristic of gasoline were not identified in the gas chromatograms from the TFH analyses. Heavier hydrocarbons are also present in the soils, as indicated by the high concentrations of TPH.

Water samples from MW-39-1 and MW-39-2 were also analyzed for TFH concentration by Enviros in their Bellevue laboratory. TFH was not detected in the sample from MW-39-1 (<1 ppm). The TFH concentration in the water sample from well MW-39-2 was 5 ppm.

Table 2-5. Soil Sample Analyses.

Sample Number	Sample Depth (feet)	Vapor Reading (ppm)	TFH By 8015 (ppm)	TPH By 418.1 (ppm)	Fuel Type
S-3-SW	6.0	73	16,000	77,882	Diesel/Kerosene
S-4-NE	6.0	50	15,000	28,544	Diesel/Kerosene
MW-39-1-1	3.5		<1.0		None
MW-39-1-2	8.5		<1.0		None
MW-39-2-1	5.0	63	7,600	28,454	Diesel Fuel #2
MW-39-2-2	8.5	39	3,500	10,083	Diesel Fuel #2
MW-39-3-1	3.5	9	<1.0		None
MW-39-3-2	8.5	30	1,300	·	Diesel Fuel #2

#### 3.0 DISCUSSION

Hydrocarbon contamination is present in the soils adjacent to and upgradient of the site of Tank 91N, removed in December 1989. Upgradient contamination has been present since at least August 1987 (GeoEngineers, 1987). Free product was observed during excavation for foundations of the W-390 building north (upgradient) of the site in 1987 (Chempro, personal communication). Concentrations of diesel fuel in the soils encountered during drilling of MW-39-2 and MW-39-3 greatly exceed the Department of Ecology's (Ecology) soil cleanup guidance level of 200 ppm for hydrocarbons in soils.

Free product was observed in soil samples from above the water table while drilling MW-39-2 and MW-39-3. Free product was observed floating on water in well CP-107 and in MW-39-3 in January and February, 1990. Free product was not seen on the water surface in well MW-39-2 in February; however, the water table elevation in January and February 1990 was higher than normal because of higher than average precipitation. The water table elevation in December, at the time Tank 91N was removed, was at least two feet below the January and February level.

Approximately 10 inches of free product was present in upgradient well MW-39-3, and a trace was observed in wells installed during the Chempro site investigation. Groundwater in the vicinity of the former tank site has not been significantly affected by diesel fuel because of diesel fuel's low solubility. The TFH concentration of 5 ppm in water from well MW-39-2 was below Ecology's cleanup level of 15 ppm.

Residual product was apparently in the soil pore spaces beneath the water table during the construction of well MW-39-2. Laboratory analyses of the samples from 4.5 to 5 and 8 to 8.5 feet below grade contained 1 to 3 percent petroleum hydrocarbons. The water table was approximately 1 to 4 feet above the depth of these samples. As diesel fuel is generally not soluble in water, the high concentrations of product in these samples suggests that product remained adsorbed on soils as the water table elevation rose.

Free product was observed in MW-39-2 on June 14, 1990. The depth to the top of free product was beneath the top of the well screen. Free product had apparently entered the well

after the water table elevation decreased from mid February. The thickness of free product could not be accurately measured, but is estimated to be approximately one foot.

Local contamination of the soils in the vicinity of the tank caused by leaks in the tank or normal operations is suggested by the high product concentrations in the soil samples from the tank excavation and MW-39-2.

#### 3.1 SITE REMEDIATION OPTIONS

As in any site cleanup, free product must be eliminated or recovered to reduce the amount of contaminated soils above the water table and to reduce the residual contamination below the water table. Site cleanup plans must take into account the amount of free product, concentrations of dissolved organics in the groundwater, the shallow depth to water, extent of contamination in and around the former tank site, relatively high permeability and thinness of the aquifer, loose nature of the sands which comprise the aquifer, and the presence of buried utilities throughout the site. Additionally, the method used for remediation of the site must not interfere with operations at Terminal 91.

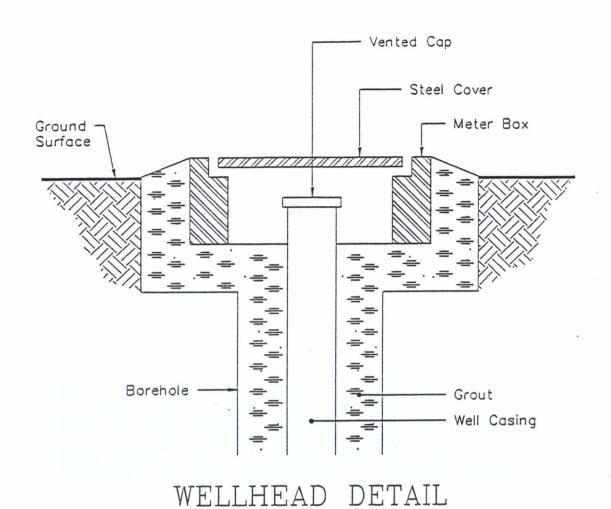
Free product may be recovered using a french drain system that includes large-diameter collector wells equipped with oil-water separators or product skimmers. Alternately, a groundwater injection/withdrawal system could be installed. This system could be used to add nutrients to the injection water to encourage biodegradation.

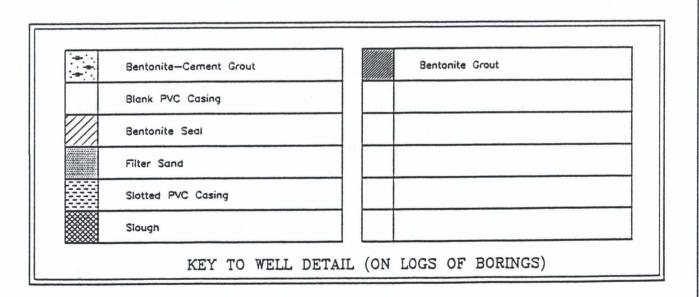
A system of individual small-diameter collector wells appears to be impractical. The thinness of the aquifer and high permeability would require that a number of closely spaced collector wells be installed. A relatively large quantity of groundwater would need to be pumped to create significant drawdown in the aquifer.

After free-product removal, elimination of contaminated soils could be performed through excavation or biodegradation. Excavated soils could be sent to the Cedar Hills Landfill or treated on site. Excavation of soils in the Terminal 91 area may be highly impractical because of the number of utility lines which cross the area, the loose nature of the soils, and the amount of traffic throughout the area.

In-place biodegradation of the product is also possible, if factors such as the high hydraulic conductivity of the soils (requiring injection and withdrawal french drains for gradient control), areal extent of contamination, and contamination above the normal water table elevation do not eliminate this method.

Extensive excavation of contaminated soils around the tank area is probably not worthwhile, as hydrocarbons will continue to migrate into the former tank site from upgradient sources. Similarly, in-place biodegradation for this tank site alone is not worthwhile because of the upgradient free product.



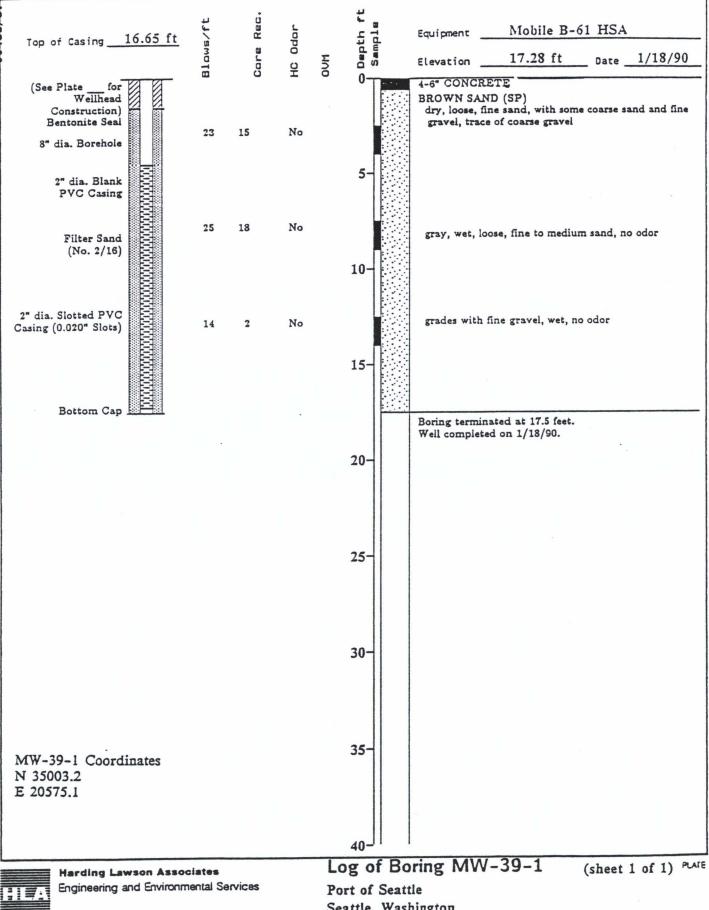




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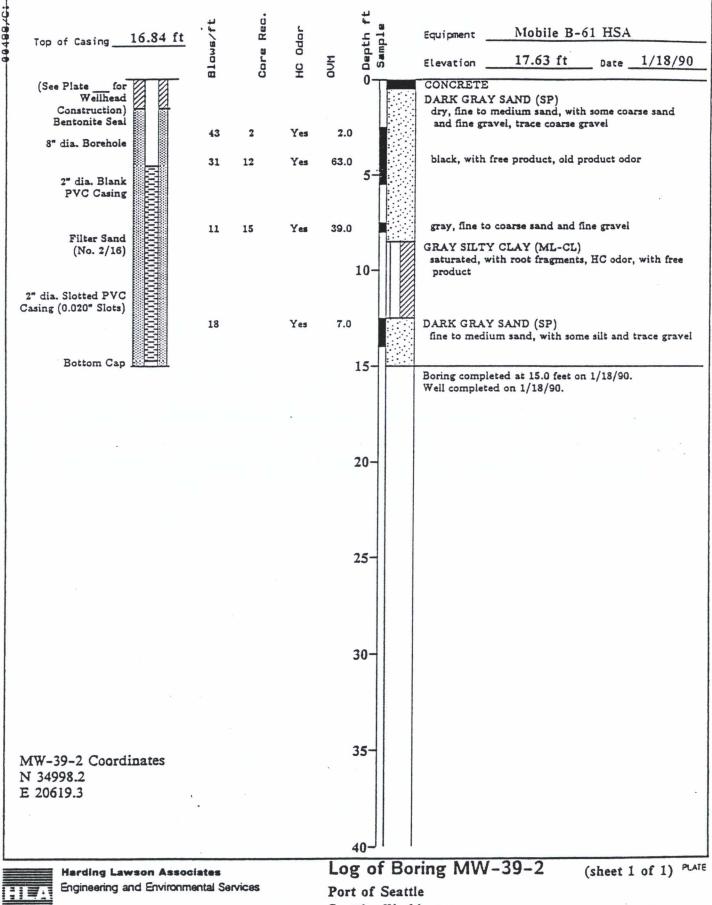
WELLHEAD DETAIL Port of Seattle Seattle, Washington

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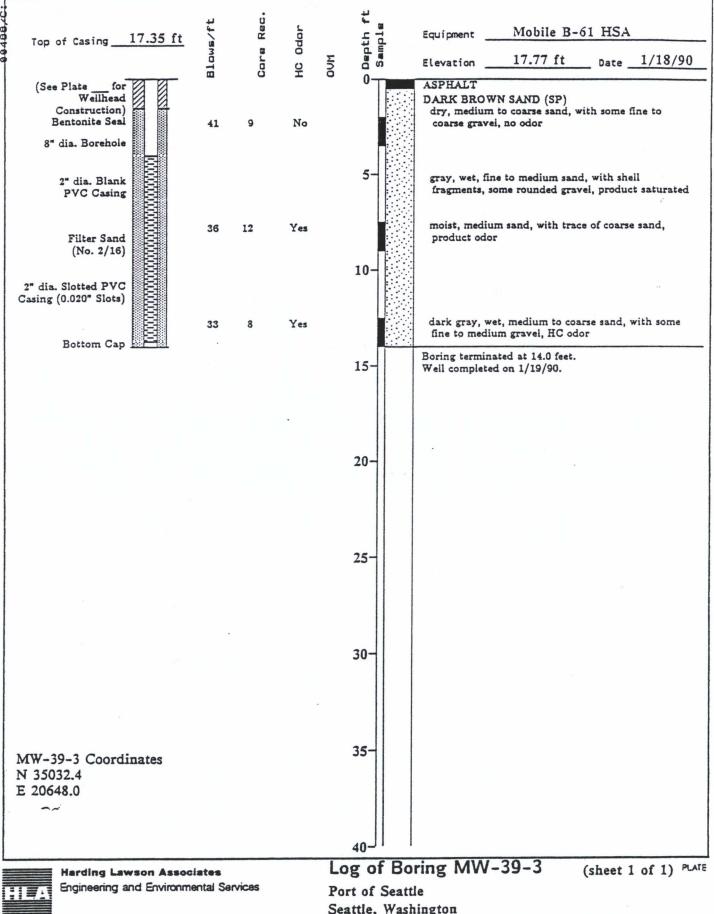
Seattle, Washington

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Seattle, Washington

DATE REVISED DATE APPROVED JOB NUMBER HK 14124,011.09 6/90



Seattle, Washington

DRAWN	JOB NUMBER	APPROVED	OATE	REVISED	DATE	
HK	14124,011.09		6/90			

# Transmissivity Estimation Method Based on Residual Drawdown in Bailed Well

Well Number: 39-2 Site: Port of Seattle For One Bail Cycle or Pumping, Use The Following: Time Bailing Began: 10hrs 43min sec Time Bailing Stopped: 10hrs 50min sec

Volume Bailed: 24.00gallons Static Water Level: 3.90feet Residual Water Level: 3.97feet at

10hrs 52min sec

Estimated Transmissivity: 7144 gallons per day per foot

955 feet squared per day

Saturated Thickness: 10.08feet

Estimated Permeability: 95 feet per day

3.3e-2 centimeters per second

Reference: Skibitzke, H.E., 1963, USGS WSP 1536-I, p. 293-298

Date of Report: February 1, 1990

Date Submitted: January 17 & 25, 1990 Project: Job # 14124-011-09

### RESULTS OF ANALYSES OF ENVIRONMENTAL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS BY IR (EPA METHOD 418.1)

Sample #	Total Petroleum <u>Hydrocarbons</u> (ppm)
POS39-2-1	28,454
POS39-2-2	10,083

## Quality Assurance:

Method Blank

<5.0

a: Analysis performed by subcontract.

Date of Report: February 1, 1990
Date Submitted: January 17 & 25, 1990

Project: Job # 14124-011-09

#### RESULTS OF ANALYSES OF SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS (C7-C32) BY MODIFIED EPA METHOD 8015

Sample #	<u>Matrix</u>	Dilution Factor	TPH (ppm)	<u>RANGE</u> (C7-C32)
POS39-1-1	soil	1	<1.0	
POS39-1-2	soil	1	<1.0	
Boring 39-3-1	soil	1	<1.0	
Boring	soil	1	1,300	C7-C24A
POS39-2-1	soil	5	7,600	C7-C24A
POS39-2-2	soil	5	3,500	C7-C24A
			*2	
Quality As	ssurance			
Method Bla	ank		<1.0	
POS39-1-1 (Duplicate	≘)	1	<1.0	
POS39-2-1 (Duplicate	≘)	5	3,700	C7-C24A
POS39-1-1 (Matrix Spiked @ 2				
Percent Re			130%	C7-C32

A - Indicative of Diesel #2

Date of Report: February 9, 1990 Date Submitted: December 22, 1990 Project: 14124-011.09 Port of Seattle

#### RESULTS OF ANALYSES OF ENVIRONMENTAL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS BY IR (EPA METHOD 418.1)

Sample #	Total Petroleum <u>Hydrocarbons</u> (ppm)
S-3-SE Cnr. Tank Bottom	77,882
S-4-NW Cnr. Tank Bottom	28,544

a: Analysis performed by subcontract.

# Appendix A